IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 6:25-cv-06226-FPG-MJP Judge Frank Paul Geraci, Jr.

THE CITY OF ROCHESTER, et al.,

Defendants.

NOTICE OF MOTION FOR LEAVE TO FILE AMICUS BRIEF

Please take notice that *Amicus Curiae* Immigration Law Reform Institute, by and through their undersigned counsel, hereby move the Court for leave to file an *Amicus Curiae* Brief in Support of Plaintiff and in Opposition to Defendants' Motion for Judgment on the Pleadings. This Motion is based upon the attached Memorandum of Law in Support of Motion to Intervene, the Declaration of Mitchell P. Snyder, and the exhibits appended to it, including the Proposed Amicus Curiae Brief in Support of Plaintiff and in Opposition to Defendants' Motion for Judgment on the Pleadings.

Pursuant to Local Rule 7(a)(1), *Amicus Curiae* intends to file reply papers.

Dated: July 22, 2025 Respectfully submitted,

/s/ Mitchell P. Snyder
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Counsel for *Amicus Curiae* Immigration Reform Law Institute **CERTIFICATE OF SERVICE**

I hereby certify that on this 22 day of July 2025, I electronically filed the foregoing Notice of

Motion with the Clerk of the Court using the CM/ECF system, which I understand to have caused service

of the parties' counsel.

Dated: July 22, 2025

/s/ Mitchell P. Snyder